

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
(Foley Square)

NANCY KINNEY, CHARLES §
TOWNSLEY, MICHAEL SAURO, §
WALTER NOFFSINGER, §
ROSA DAVIDSON, §
MICHAEL KELLY, TOM KIERL, §
CONSTANCE LEWIS, SHERI PARR, §
PAUL PHAM, ALVARO PAIZ, TITON §
HOQUE, CHRIS MANCUSO, WILBERT §
TALMADGE, JANET GELPHMAN, §
THANH DO §
Plaintiffs, §

vs. §

INTERNATIONAL BUSINESS §
MACHINES CORPORATION, §
Defendant. §

Civil Action No.: 1:21-cv-05848-ALC

AFFIDAVIT IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE

STATE OF TEXAS §

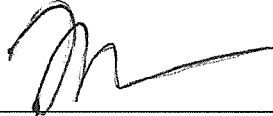
COUNTY OF TRAVIS §

I, HEIDI A. COUGHLIN, being duly sworn, hereby depose and say as follows:

1. I am an attorney with the law firm of Wright & Greenhill, P.C. My law office is located at 900 Congress Avenue, Suite 500, Austin, Texas 78701.
2. I submit this affidavit in support of my motion for admission to practice *pro hac vice* in the above-captioned matter.
3. As shown in the Certificate of Good Standing annexed hereto, I am a member in good standing with the State Bar of Texas.
4. There are no pending disciplinary proceedings against me in any state or federal court.
5. I have not been convicted of a felony.

6. I have not been censured, suspended, disbarred or denied admission or readmission by any court.
7. Wherefore, your affiant respectfully submits that she be permitted to appear as counsel and advocate *pro hac vice* in case 1:21-CV-05848-ALC for Plaintiffs Tom Kierl, Constance Lewis, Sheri Parr, Paul Pham, Chris Mancuso and Wilbert Talmadge.

FURTHER AFFIANT SAYETH NAUGHT.



HEIDI A. COUGHLIN

STATE OF TEXAS

§

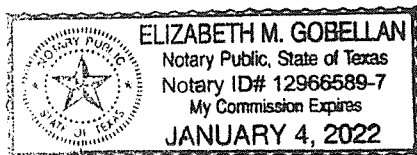
§

COUNTY OF TRAVIS

§

BEFORE ME, the undersigned authority, on this day personally appeared HEIDI A. COUGHLIN, known to me to be the person whose name is subscribed to the foregoing instrument and acknowledged to me that she executed the same for the purposes therein expressed.

SUBSCRIBED AND SWORN TO before me on this the 16th day of July, 2021.




Notary Public, State of Texas